

News from the FPPC



California Fair Political Practices Commission
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For Immediate Release: September 22, 2011

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FPPC Enforcement Decisions: September 22, 2011

The following are enforcement decisions approved by the Fair Political Practices Commission at its regular monthly meeting held on Thursday, September 22, 2011. Decisions are listed by category and include a brief summary of each case and the total amount of any administrative fine or fines in each case.

Additional information on each of the enforcement cases below can be found in the September agenda on the FPPC website at www.fppc.ca.gov. FPPC agendas are distributed and posted on the agency website at least 10 days prior to each monthly meeting.

The web version of the agenda includes links to the stipulations agreed to by the commission and by the individuals and organizations subject to the fines, or the default decisions proposed to the commission. Exhibits in support of the stipulations and proposed default decisions are also available on the website. If you are unable to access the FPPC website, or need further assistance, please call the FPPC communications office at (916) 322-7761.

Campaign Reporting Violations

Charles R. Brehmer, Brehmer for Judge and Jon W. Parnell. In the 2008 general election, Charles R. Brehmer was a successful candidate for Kern County Superior Court. Brehmer for Judge was his candidate controlled committee and Jon W. Parnell was the committee's treasurer. They received three cash contributions of \$100 or more, failed to disclose the true source of a loan received, and failed to timely file two semi-annual campaign statements, for the January 1, 2009, through June 30, 2009, and July 1, 2009, through December 31, 2009, reporting periods. **\$5,500 fine.**

Sergio Casanova and Alhambra Firefighter's PAC. Alhambra Firefighter's PAC, a state general purpose committee, and its treasurer, Sergio Casanova, failed to file a semi-annual campaign statement for the July 1, 2009, through December 31, 2009, reporting period, the January 1, 2010, through June 30, 2010, reporting period, and the July 1, 2010, through December 31, 2010, reporting period. **\$7,500 fine.**

Cindy Finerty, Committee to Elect Cindy Finerty, and Debbi Hall. Cindy Finerty is currently a member of the Palm Desert City Council and has been a member since 2006. The Committee to Elect Cindy Finerty is her controlled committee and, at all relevant times, Debbi Hall was the committee's treasurer. The Committee to Elect Cindy Finerty made an impermissible independent expenditure to support Jean Benson and Jim Ferguson for Palm Desert City Council in the November 2, 2010, election. **\$2,500 fine.**

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Ben Hueso, Ben Hueso for State Assembly 2010, and Nancy Haley, Treasurer. The Ben Hueso for State Assembly 2010 committee impermissibly contributed twenty-five thousand dollars (\$25,000) to San Diegans for Healthy Neighborhoods and a Strong Economy to Support Felipe Hueso for City Council - 2010 Sponsored by San Diego-Imperial Counties Labor Council AFL-CIO, for the purpose of making independent expenditures to support another candidate. **\$2,000 fine.**

Stuart Waldman, Friends of Stuart Waldman, and Kinde Durkee. Stuart Waldman was an unsuccessful candidate for the California State Assembly, 40th District, in the 2008 primary election. Friends of Stuart Waldman was his controlled committee and Kinde Durkee was the committee's treasurer. In this matter, from January 1, 2006, through June 30, 2008, they failed to deposit personal funds totaling approximately \$76,000 into the committee's single, designated campaign bank account prior to expenditure. Also, for the reporting periods from January 1, 2006, through June 30, 2008, they failed to correctly report campaign expenditures totaling approximately \$76,000 on filed campaign statements. Additionally, they failed to timely report subvendor information for payments totaling approximately \$173,013 on the semi-annual campaign statement filed for the period ending June 30, 2008. **\$8,000 fine.**

Asian American Political Empowerment Committee and Buu Thai, Treasurer. The Asian American Political Empowerment Committee and the committee's treasurer, Buu Thai, failed to timely file a semi-annual campaign statement for the reporting period of July 1, 2008, through December 31, 2008. **\$200 fine.**

Citizens for Integrity in Government and Armando Aravlozo, Treasurer. The Citizens for Integrity in Government Committee and its treasurer, Armando Aravlozo, failed to timely file semi-annual reports covering the periods January 1, 2006, through December 31, 2006, due July 31, 2006, and January 31, 2007; January 1, 2007, through December 31, 2007, due July 31, 2007, and January 31, 2008; January 1, 2008, through June 30, 2008, due July 31, 2008; and January 1, 2010, through June 30, 2010, due July 31, 2010, with the City of Santa Clarita. **\$800 fine.**

City of Beaumont Candidate Victor Dominguez and Victor Dominguez for Beaumont City Council 2010. Victor Dominguez and Victor Dominguez for Beaumont City Council 2010 failed to timely file a semi-annual campaign statement for the period October 17, 2010, through December 31, 2010, due January 31, 2011. **\$200 fine.**

Gabrielian for Glendale College and Anita Gabrielian. Glendale Community College District Board of Trustees member and candidate Anita Gabrielian, and her committee, Gabrielian for Glendale College, failed to timely file a semi-annual campaign statement, for the reporting period of July 1, 2010, through December 31, 2010. **\$200 fine.**

Noel A. Jaimes, State Senate Candidate, failed to timely file a Form 470 campaign statement covering the period January 1, 2010, through December 31, 2010, due on March 22, 2010, with the Secretary of State. **\$400 fine.**

Roberto Cruz, County of Los Angeles El Monte School District Member, failed to timely file a Form 470 campaign statement covering the period January 1, 2010, through December 31, 2010, due on August 2, 2010, with the County of Los Angeles. **\$200 fine.**

Philip Janzen and Committee to Elect Philip Janzen. Philip Janzen was a candidate for the Madera Unified School District Board of Trustees and the Committee to Elect Philip Janzen was his controlled committee. They failed to timely file a semi-annual campaign statement for the period October 22, 2006, through December 31, 2006. **\$400 fine.**

NorCal Grassroots for John Martinez and John Martinez, Treasurer. John Martinez and his committee, NorCal Grassroots for John Martinez, failed to timely file two semi-annual campaign statements for the reporting periods ending June 30, 2008, and December 31, 2008. **\$400 fine.**

Santa Barbara County Lincoln Club and Cory Bantilan, Treasurer. Santa Barbara County Lincoln Club and its treasurer, Cory Bantilanm, failed to file a semi-annual campaign statement for the July 1, 2010, through December 31, 2010, reporting period, by the January 31, 2011 deadline. **\$400 fine.**

Tuolumne County Democratic Central Committee, and Joann M. Rascon, Treasurer. The Tuolumne County Democratic Central Committee, and its treasurer, Joann M. Rascon, failed to timely file one semi-annual campaign statement for the reporting period July 1, 2010, through December 31, 2010. **\$200 fine.**

Jennifer Villaseñor, Committee to Elect Jennifer Villaseñor, and Stephanie Villaseñor, Treasurer. Jennifer Villaseñor, Committee to Elect Jennifer Villaseñor, and the committee's treasurer Stephanie Villaseñor, failed to timely file three semi-annual campaign statements for the reporting periods of July 1, 2007, through December 31, 2007, January 1, 2008, through June 30, 2008, and July 1, 2008, through December 31, 2008. **\$600 fine.**

Conflicts of Interest Violation

California law states that, absent an exception, a public official may not make, participate in making or in any way attempt to use his or her official position to influence a governmental decision in which he or she knows or has reason to know he or she has a financial interest. The following official used his official position to influence a governmental decision in which he had a financial interest:

Jan Horton, as a member of the Yorba Linda City Council, impermissibly made a governmental decision in which she had a material financial interest, by voting to send the 2008-2014 Draft Housing Element back to staff for refinement on the housing densities of specific parcels, including the reduction of the housing densities proposed at the Lakeview/Strawberry Field parcel and the Lakeview/Altrudy parcel, located within 500 feet of her real property. **\$3,000 fine.**

Gift Limit Violation

California law imposes annual gift limits and requires that gifts received from reportable sources must be disclosed on a Statement of Economic Interests. The following individual accepted a gift that exceeded the annual gift limit:

Bob Archuleta, a member of the Pico Rivera City Council, accepted gifts from a single source in 2008, which exceeded the respective annual gift limit of \$390. **\$1,500 fine.**

Lobbying Violations

California law requires lobbyist employers to file reports to provide the public with specified information, including payments made in connection with lobbying activity. The following failed to timely file the required forms:

AMN Healthcare, Inc., a registered California lobbyist employer, failed to timely file quarterly lobbyist employer reports for the July 1, 2010, through September 30, 2010, and October 1, 2010, through December 31, 2010, reporting periods. AMN Healthcare, Inc. made \$24,212.34 in payments to lobbying firms during those reporting periods. **Total Proposed Penalty: \$1,600.**

California Gaming Association, a lobbyist employer, failed to timely file a quarterly statement for the reporting period of July 1, 2010, through September 30, 2010 (during which it spent \$15,000 on lobbying activity). **\$200 fine.**

California Youth Build Coalition, a lobbyist employer, failed to timely file eight lobbyist employer reports for the reporting periods ending March 31, 2008; June 30, 2008; September 30, 2008; December 31, 2008; June 30, 2009; September 30, 2009; December 31, 2009; and March 31, 2010. During this time, California Youth Build Coalition spent \$45,750 on lobbying activity. **\$1,600 fine.**

Matt Gray and STS Ventures LLC, a lobbyist employer, failed to timely file two lobbyist employer reports for the reporting periods ending September 30, 2010, and December 31, 2010. **\$400 fine.**

Starbucks Coffee Company, a lobbyist employer, failed to timely file one quarterly statement for the reporting period of July 1, 2010, through September 30, 2010. During this time, Starbucks Coffee Company spent \$22,500 on lobbying activity. **\$200 fine.**

Major Donor Violations

A major donor is a person or entity who makes contributions totaling \$10,000 or more in a calendar year and is required to file campaign reports detailing how much was contributed and to whom. The following failed to file major donor reports as required by law:

William Abbott, who qualified as a major donor committee in the first half of 2010, failed to timely disclose 11 contributions, totaling \$13,699.50, to various candidates, both state and local, on a semi-annual statement covering the first half of 2010. **\$537 fine.**

Zelma Allred, a major donor committee, failed to timely file a major donor statement, Form 461, for contributions totaling \$3,000 for the period July 1, 2009, through December 31, 2009. **\$400.00 fine.**

Mass Mailing Violations

California law requires a candidate or committee that sends over 200 substantially similar pieces of mail in a calendar month to include specific information about the candidate or committee. The following did not include the required information:

Peter Cuthbert qualified as an independent expenditure committee in October of 2010. Prior to the November 2, 2010, La Mesa City Council election, Mr. Cuthbert paid for and caused to be sent a mass mailer which endorsed two city council candidates and a mayoral candidate on the ballot in La Mesa, which failed to identify the sender of the mailer. **\$2,500 fine.**

Paul Fickas and Decline to State Voter Guide. Decline to State Voter Guide is a slate mailer organization. Paul Fickas formed Decline to State Voter Guide and directed its activity. They failed to include required wording in the slate mailer disclaimer "Notice to Voters" and to place asterisks following the names of the candidates that paid to appear in slate mailers sent in connection with the November 2, 2010, election. **\$1,500 fine.**

Robocall Disclosure Violation

California law requires a committee that pays for 500 or more similar telephone calls supporting or opposing a candidate or ballot measure to disclose the name of the organization that paid for or authorized the call. The following committee did not disclose the required information:

Neighbors Opposing Tebbs, Eason & Haney for Fire Board 2010, and Thomas J. Franci, Treasurer. On or about October 15, 2010, Neighbors Opposing Tebbs, Eason & Haney for Fire Board 2010, a recipient committee, and its treasurer, Thomas J. Franci, expended campaign funds on "robocalls" (telephone calls that are similar in nature and aggregated 500 or more in number) without disclosing the name of the organization that authorized or paid for the calls to the recipients of the calls. **\$1,500 fine.**

Statements of Economic Interests Violations

California law requires elected officials, certain board members and governmental employees, and consultants employed by governmental entities to complete and file Statements of Economic Interests (SEIs or Form 700s). SEIs serve a dual purpose: they make a filer aware of personal economic interests relative to a governmental decision, and they are an important disclosure document for the public and media. The following individuals failed to file their Statement of Economic Interests forms on time:

Justin Daddow, a member of the California Rice Commission, failed to file a 2009 annual Statement of Economic Interests. **\$400 fine.**

David Kim, Integrated Waste Management Task Force Commissioner (County of Los Angeles), failed to timely file an annual Statement of Economic Interests for the reporting period of January 1 through December 31, 2009. **\$400 fine.**

Mark Schott, FPPC No. 10/616. Staff: Commission Counsel Zachary W. Norton and Special Investigator Janet Seely. Mark Schott, a Dixie School District board member, failed to file a 2009 annual Statement of Economic Interests. **\$400 fine.**

The following individuals failed to include all economic interests that were required to be disclosed in their Statement of Economic Interests:

Gary Corlett, Associate Director of Operations, California State University, Channel Islands, failed to disclose gifts of a round of golf and multiple lunches from Ameresco, Inc. valued at approximately \$125 on his 2007 annual Statement of Economic Interests. **\$200 fine.**

David Hutt, Superintendent of the San Bruno Park School District, failed to report his wife's source of income, Champions, on his 2007, 2008, 2009, and 2010 annual Statements of Economic Interests. **\$800 fine.**

CalPERS Statements of Economic Interests – Non-Reporting

Jesus Arguelles, Portfolio Manager with CalPERS, failed to timely disclose gifts on his 2006 annual Statement of Economic Interests, covering the period January 1, 2006, through December 31, 2006, his 2007 annual Statement of Economic Interests, covering the period January 1, 2007, through December 31, 2007, and his 2008 annual Statement of Economic Interests, covering the period January 1, 2008, through December 31, 2008. The gifts received were: a gift of entertainment from ARES totaling \$73.00 in 2006; gifts of a softball event and meal from LP Capital Advisors totaling \$95.00 in 2006; gifts of meals from PCGI totaling \$125.00 in 2006; gifts of meals from Advent International totaling \$60.80 in 2007; gifts of bowling and a meal from LP Capital Advisors totaling \$74.00 in 2007; gift of a meal from UBS totaling \$57.68 in 2007; gifts of a dinner and gift bag from Advent International totaling \$89.02 in 2008; gift of entertainment from Carlyle Group totaling \$103.95 in 2008; gift of a windbreaker from GGV totaling \$78.92 in 2008; gifts of event and a meal from LP Capital Advisors totaling \$71.00 in 2008; and a gift of entertainment from Oak Hill Investment Managers totaling \$30.00 in 2008. **\$2,200 fine.**

Lyndall Baker; Portfolio Manager with CalPERS, failed to timely disclose gifts of entertainment, food, and beverage valued at \$97.28 from LP Capital Advisors on his 2006 annual Statement of Economic Interests, covering the period of January 1, 2006, through December 31, 2006, as well as entertainment, food, and beverage valued at \$99.29 from LP Capital Advisors on his 2007 annual Statement of Economic Interests, covering the period of January 1, 2007, through December 31, 2007, and also including gifts of entertainment valued at \$71.74 from LP Capital Advisors on his 2008 annual Statement of Economic Interests, covering the period of January 1, 2008, through December 31, 2008. **\$600 fine.**

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Sarah Corr, Senior Portfolio Manager with CalPERS, failed to timely disclose the gifts detailed below on her 2006 annual Statement of Economic Interests, covering the period January 1, 2006, through December 31, 2006, her 2007 annual Statement of Economic Interests, covering the period January 1, 2007, through December 31, 2007, and her 2008 annual Statement of Economic Interests, covering the period January 1, 2008, through December 31, 2008. The gifts received were: gifts of a softball game and meals from LP Capital Advisors totaling \$97.00 in 2006; gifts of entertainment from TPG Capital totaling \$60.00 in 2006; gifts of bowling and a meal from LP Capital Advisors totaling \$60.00 in 2007; gift of entertainment from TPG Capital totaling \$60.00 in 2007; gift of a meal from Carlyle Group totaling \$50.00 in 2008; gifts of a softball game, billiards, and meals from LP Capital Advisors totaling \$72.00 in 2008; gifts of meals and a movie from Oak Hill Investment Managers totaling \$83.00 in 2008; gifts of meals and a gift card from Probitas Partners totaling \$68.00 in 2008. **\$1,600 fine.**

Richard Duffy, as an investment officer with CalPERS, failed to disclose a gift of Rose Bowl tickets, valued at \$199.80, received from Western Assets on his 2006 annual Statement of Economic Interests, covering the period January 1, 2006, through December 31, 2006, as well as gifts of lunch and dinner, valued at \$103.50 received from Turner Investment Partners on his 2007 annual Statement of Economic Interests, covering the period January 1, 2007, through December 31, 2007. **\$400 fine.**

Michael Dutton, Portfolio Manager with CalPERS, failed to disclose a total of 11 gifts. On his 2006 annual Statement of Economic Interests, covering the period January 1, 2006, through December 31, 2006, Mr. Dutton failed to disclose wine valued at \$50.00, received from Credit Suisse and a softball event and lunch valued at \$97.00 from LP Capital Advisors. On his 2007 annual Statement of Economic Interests, covering the period January 1, 2007, through December 31, 2007, Mr. Dutton failed to disclose a back pack and dinner from Blackstone totaling \$80.00, golf and a bag from Hamilton Lane totaling \$150.00, basketball game tickets from UBS totaling \$100, dinner from PCG totaling \$75.00, meals from Lexington totaling \$55.00, bowling and lunch from LP Capital Advisors totaling \$99.00, and meals from Audax totaling \$95.00. On his 2008 annual Statement of Economic Interests, covering the period January 1, 2008, through December 31, 2008, Mr. Dutton failed to disclose a holiday party from LP Capital Advisors totaling \$75.00 and meals from Credit Suisse totaling \$55.00. **\$2,200 fine.**

Robert Eberhardt, Portfolio Manager for CalPERS, failed to timely disclose gifts on his 2008 annual Statement of Economic Interests, covering the period January 1, 2008, through December 31, 2008, and his 2009 annual Statement of Economic Interests, covering the period January 1, 2009, through December 31, 2009. The gifts received were: meals, CD, tie, and scarf from Hines totaling \$375.00 in 2008; sweatshirt, tote, and perfume from Starwood totaling \$245.00 in 2009. **\$400 fine.**

Rob Feckner, as elected President of the Board of CalPERS, failed to disclose 4 gifts of meals and drinks received from AEW, valued at \$176.63 in total, on his 2007 Annual Statement of Economic Interests, covering the period January 1, 2007 through December 31, 2007, as well as a gift of dinner valued at \$100.76 received from Goldman Sachs on his 2008 Annual Statement of Economic Interests, covering the period January 1, 2008 through December 31, 2008. **\$400 fine.**

Alfonso Fernandez, Senior Portfolio Manager for CalPERS, failed to timely disclose two gifts. On his 2006 annual Statement of Economic Interests, covering the period January 1, 2006, through December 31, 2006, he did not disclose a gift of two bottles of wine totaling \$123.50 from Black Rock and, on his 2007 annual Statement of Economic Interests, covering the period January 1, 2007, through December 31, 2007, he failed to disclose a gift of a meal at Spataro's valued at \$60.00. **\$400 fine.**

Shaun "John" Greenwood, Portfolio Manager for CalPERS, failed to timely disclose 32 gifts on his 2006 annual Statement of Economic Interests, covering the period January 1, 2006, through December 31, 2006, his 2007 annual Statement of Economic Interests, covering the period January 1, 2007, through December 31, 2007, his 2008 annual Statement of Economic Interests, covering the period January 1, 2008, through December 31, 2008, and his 2009 annual Statement of Economic Interests, covering the period January 1, 2009, through December 31, 2009. The gifts received were: gifts of a coat and bag and musical performance from Carlyle Group totaling \$175.00 in 2006; gifts of meals from Credit

Suizze totaling \$125.00 in 2006; gifts of softball, lunch, and drinks from LP Capital Advisors totaling \$104.20 in 2006; gift of a musical performance from Rhone totaling \$275.00 in 2006; gift of a shirt, bag, and lunch from Thomas Lee Partners totaling \$125.00 in 2007; gifts of musical performances from Rhone totaling \$70.00 in 2007; gift of tickets to Cirque show from Carlyle Group totaling \$100.00 in 2007; gifts of meals and wine from Credit Suisse totaling \$155.00 in 2007; gifts of meals from Carlyle Group totaling \$75.00 in 2008; gifts of meals from Environmental totaling \$100.00 in 2008; gifts of meals, a shirt, a jacket, whiskey, and a musical performance from SL Capital totaling \$345.00 in 2008; gifts of meals, a headset, book, and bottle from Khosla totaling \$160.00 in 2008; gifts of meals from Credit Suisse totaling \$185.00 in 2009; gifts of meals from SL Capital totaling \$95.00 in 2009; gifts of meals from CVC Asia totaling \$150.00 in 2009; gifts of various items from Carlyle Group totaling \$195.00 in 2009; gifts of various items from Carlyle Riverstone totaling \$186.00 in 2009; and gifts of meals from Pacific Corp totaling \$80.00 in 2009. **\$3,600 fine.**

Sue Kane, as principal advisor to the Board President of CalPERS, failed to disclose one gift of dinner, valued at \$100.76 and received from Goldman Sachs in 2008, on her 2008 annual Statement of Economic Interests, covering the period January 1, 2008, through December 31, 2008. **\$200 fine.**

Dennis Knueven, Portfolio Manager with CalPERS, failed to disclose a total of 8 gifts on his 2008 annual Statement of Economic Interests, covering the period January 1, 2008, through December 31, 2008. he failed to disclose gifts of a bag and a kayak trip valued at \$90.00, received from Draper Fischer Jurvetson, as well as gifts of meals, a t-shirt, parking, and a movie from LP Capital Advisors valued at \$87.00. On his 2009 annual Statement of Economic Interests, covering the period January 1, 2009, through December 31, 2009, he failed to disclose a gift of a USB device/flip camera received from Silver Lake totaling \$129.99 and a gift of meals from Thomas Weisel Venture totaling \$86.00. **\$800 fine.**

Joncarlo Mark, Senior Portfolio Manager with CalPERS, failed to disclose a total of 7 gifts. On his 2006 annual Statement of Economic Interests, covering the period January 1, 2006, through December 31, 2006, he failed to disclose meals valued at \$85.00 received from Alpha Capital Partners and meals from Credit Suisse valued at \$294.00. On his 2007 annual Statement of Economic Interests, covering the period January 1, 2007, through December 31, 2007, he failed to disclose meals received from Credit Suisse valued at \$230.00, meals from Advent International valued at \$85.00, a pen and notebook received from Birch Hill Equity Partners Toronto valued at \$107.00, and a gift of a face scrubber received from Rosewood Capital valued at \$100.00. On his 2008 annual Statement of Economic Interests, covering the period January 1, 2008, through December 31, 2008, he failed to disclose various items and a canvas bag received from Leonard Green and Partners valued at \$50.00. **\$1,400 fine.**

Dave Merwin, Investment Officer, failed to disclose 10 gifts on four annual Statements of Economic Interests for 2006, 2007, 2008 and 2009. In 2006, gifts included entertainment valued at \$50.00 from Freeman, Spogli Partners; softball/open house valued at \$95.00 from LP Capital Advisors; a golf clinic, shirt, bag, and golf balls from Silver Lake Partners valued at \$430.00. In 2007, gifts included private equity review/overview valued at \$99.00 from LP Capital Advisors; golf green fees, shirt, bag and golf balls valued at \$310 from Silver Lake Partners. In 2008, gifts included tickets to the Oakland Raiders valued at \$355 from Centinella Capital Partners; entertainment valued at \$100 from Freeman, Spogli Partners; softball/holiday party valued at \$72 from LP Capital Advisors; and golf green fees, bag, vest, hat and flashdrive valued at \$650 from Silver Lake Partners. In 2009, an Apple Ipod Touch valued at \$187. He received two gifts over the applicable gift limit in 2006 and 2008: golf clinic, shirt, bag, and golf balls valued at \$430 from Silver Lake Partners in 2006 and golf green fees, bag, vest, hat and flashdrive valued at \$650 in 2008. Mr. Merwin reimbursed the donor Silver Lake Partners for those gifts received over the gift limit. **\$2,400 fine.**

Louis F. Moret, CalPERS Boardmember, failed to disclose two gifts of dinner from AEW Capital Management and a dinner from Capital Guardian valued at \$217.21 on his 2008 annual Statement of Economic Interests. **\$400 fine.**

Mary Morris, CalPERS Investment Officer, failed to disclose a gift of a hot air balloon ride, dinner and dance from Corporate Library valued at \$420 on her 2009 annual Statement of Economic Interests. **\$200 fine.**

Omid Rezanian, CalPERS Investment Officer, failed to disclose 12 gifts of meals and drinks on his 2006, 2007, 2008 and 2009 annual Statements of Economic Interests. The gifts received were: In 2006, from Hotspot, Wendy Rosen, a Christmas gift and meal totaling \$80; from Rogge Asset Mgmt, Olaf Roffe meals totaling \$50.00; from State Street, John Moore, Christmas gift and meal totaling \$60; from UBS, Laura Lifland, meals valued at \$60; from Western Assets, drinks and dinner valued at \$137.11. In 2007, from Barings Asset Mgmt, Susan Marshal, meals valued at \$70.00; from Rogge Asset Mgmt, Olaf Rogge, meals valued at \$55.00; from State Street, John Moore, meals valued at \$75. In 2008, from Bank of Montreal, a gift and meal valued at \$75. In 2009, from Barings Asset Mgmt, meals valued at \$50; from Rogge Asset Mgmt, Olaf Rogge, a meal valued at \$30, and from State Street, John Moore, a meal valued at \$65.00. **\$2,400 fine.**

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